## AMENDMENTS TO THE DRAWINGS

The attached sheet(s) of drawings includes changes to Figs. 1 and 2.

Attachment: Replacement sheets.

## REMARKS

Favorable reconsideration of this application, in light of the preceding amendments and following remarks, is respectfully requested.

Claims 1 - 8 and 10 - 16 and 18 - 26 and 28 - 36 are pending in this application. Claim 27 is currently canceled without prejudice and claim 9 was previously canceled. Claim 17 was previously withdrawn. Claims 1 - 8, 10 - 16 and 18 - 24, 26, and 28 - 36 are currently amended. Applicant respectfully submits that no new matter has been added by the amendments.

Specification paragraph 0069 has been amended to correct an obvious typographical error. The I-beam is correctly identified with element number 92 and not element number 84. Support for this amendment may be found in, for example, Specification paragraph 0069 and Fig. 13. Applicants respectfully submit that no new matter has been added by the amendment.

## Drawing Objections

Figs. 1 and 2 have been amended as suggested by the Examiner.

In Fig. 1, the arrows at the ends of lead lines for each of the three occurrences of the reference numeral "30" have been removed as suggested by the Examiner.

In Fig. 2, the section line 6-6 has been moved to "slice" through the lower perimeter rail member 18 as suggested by the Examiner.

No new matter has been added by the amendments. Withdrawal of the objection is requested.

## Claim Objections

Applicant has amended the claims as suggested by the Examiner to overcome the claim objections to claims 1 - 8, 10 - 14 and 18 - 23. The following is a summary of the claim

amendments. Additional formal amendments have been made to correct antecedent basis and obvious errors. Applicant respectfully submits that no new matter has been made by the amendments.

(1) In claim 1, line 14, the recitation of "one said longitudinal rail members" has been changed to --one of said longitudinal rail members-- as suggested by the Examiner.

(2) In claim 2, line 4, the recitation of "the longitudinal rail" has been changed to --the longitudinal rail member-- as suggested by the Examiner.

(3) In claim 2, line 5, the recitation of "the longitudinal rail" has been changed to --the longitudinal rail member-- as suggested by the Examiner.

(4) In claim 3, lines 1-2, the recitation of "a first of said longitudinal rails" has been changed to --a first of said longitudinal [[rails]] rail members-- as suggested by the Examiner.

(5) In claim 3, line 2, the recitation of "a first secondary rail" has been changed to --a first secondary rail member-- as suggested by the Examiner.

(6) In claim 3, line 3, the recitation of "said first longitudinal rail" has been changed to --said first longitudinal rail member-- as suggested by the Examiner.

(7) In claim 3, line 3, the recitation of "a second of said longitudinal rails" has been changed to --a second of said longitudinal [[rails]] rail members-- as suggested by the Examiner.

(8) In claim 3, line 4, the recitation of "a second secondary rail" has been changed to --a second secondary rail member-- as suggested by the Examiner.

(9) In claim 3, line 4, the recitation of "said second longitudinal rail" has been changed to --said second longitudinal rail member-- as suggested by the Examiner.

(10) In claim 3, line 5, the recitation of "said first longitudinal rail" has been changed to --said first longitudinal rail member-- as suggested by the Examiner.

(11) In claim 3, line 5, the recitation of "said second longitudinal rail" has been changed to --said second longitudinal rail member-- as suggested by the Examiner.

(12) In claim 3, lines 5-6, the recitation of "said rectangular unitary frame" has been changed to --said ~~rectangular~~ unitary frame-- as suggested by the Examiner.

(13) In claim 4, line 1, the recitation of "a first secondary rail" has been changed to --[[a]] the first secondary rail member-- as suggested by the Examiner.

(14) In claim 4, line 2, the recitation of "said first longitudinal rail" has been changed to --said first longitudinal rail member-- as suggested by the Examiner.

(15) In claim 4, lines 2-3, the recitation of "said first longitudinal rail retaining structure" has been changed to --said first longitudinal rail member retaining structure-- as suggested by the Examiner.

(16) In claim 4, line 3, the recitation of "a second secondary rail" has been changed to --[[a]] the second secondary rail member-- as suggested by the Examiner.

(17) In claim 4, lines 3-4, the recitation of "said second longitudinal rail" has been changed to --said second longitudinal rail member-- as suggested by the Examiner.

(18) In claim 4, line 4, the recitation of "said second longitudinal rail retaining structure" has been changed to --said second longitudinal rail member retaining structure-- as suggested by the Examiner.

(19) In claim 4, line 5, the recitation of "said first secondary rail" has been changed to --said first secondary rail member-- as suggested by the Examiner.

(20) In claim 4, line 5, the recitation of "said second secondary rail" has been changed to --said second secondary rail member-- as suggested by the Examiner.

(21) In claim 4, line 8, the recitation of "said first secondary rail" has been changed to --said first secondary rail member-- as suggested by the Examiner.

(22) In claim 4, line 9, the recitation of "said second secondary rail" has been changed to --said second secondary rail member-- as suggested by the Examiner.

(23) In claim 5, lines 1-2, the recitation of "a third of said longitudinal rails" has been

changed to --a third of said longitudinal [[rails]] rail members-- as suggested by the Examiner.

(24) In claim 5, line 2, the recitation of "a pair of third secondary rails" has been changed to --a pair of third secondary [[rails]] rail members-- as suggested by the Examiner.

(25) In claim 5, line 3, the recitation of "said third longitudinal rail" has been changed to --said third longitudinal rail member-- as suggested by the Examiner.

(26) In claim 5, lines 3-4, the recitation of "a fourth of said longitudinal rails" has been changed to --a fourth of said longitudinal [[rails]] rail members-- as suggested by the Examiner.

(27) In claim 5, line 4, the recitation of "a pair of fourth secondary rails" has been changed to --a pair of fourth secondary [[rails]] rail members-- as suggested by the Examiner.

(28) In claim 5, line 5, the recitation of "said fourth longitudinal rail" has been changed to --said fourth longitudinal rail member-- as suggested by the Examiner.

(29) In claim 5, lines 5-6, the recitation of "said third longitudinal rail" has been changed to --said third longitudinal rail member-- as suggested by the Examiner.

(30) In claim 5, line 6, the recitation of "said fourth longitudinal rail" has been changed to --said fourth longitudinal rail member-- as suggested by the Examiner.

(31) In claim 5, lines 6-7, the recitation of "said rectangular unitary frame" has been changed to --said ~~rectangular~~ unitary frame-- as suggested by the Examiner.

(32) In claim 5, line 7, the recitation of "said first and second longitudinal rails" has been changed to --said first and second longitudinal [[rails]] rail members-- as suggested by the Examiner.

(33) In claim 6, line 4, the recitation of "said through hole" has been changed to "said at least one louver-support through hole in the center louver support rail" to refer to the through holes in the center louver support rail and not through holes in the first and second secondary rails as suggested by the Examiner.

(34) In claim 7, line 4, the recitation of "said louver-support through hole" has been

changed to "said at least one louver-support through hole in the center louver support rail" to refer to the through holes in the center louver support rail and not through holes in the first and second secondary rails as suggested by the Examiner.

(35) In claim 7, line 6, the recitation of "said center louver support" has been changed to --said center louver support rail-- as suggested by the Examiner.

(36) In claim 7, line 6, the recitation of "said third longitudinal rail" has been changed to --said third longitudinal rail member-- as suggested by the Examiner.

(37) In claim 7, line 7, the recitation of "said center louver support" has been changed to --said center louver support rail-- as suggested by the Examiner.

(38) In claim 7, lines 7-8, the recitation of "said fourth longitudinal rail" has been changed to --said fourth longitudinal rail member-- as suggested by the Examiner.

(39) In claim 7, line 8, the recitation of "said center louver support" has been changed to --said center louver support rail-- as suggested by the Examiner.

(40) In claim 7, line 9, the recitation of "said pair of third secondary rails" has been changed to --said pair of third secondary [[rails]] rail members-- as suggested by the Examiner.

(41) In claim 7, line 9, the recitation of "said pair of fourth secondary rails" has been changed to --said pair of fourth secondary [[rails]] rail members-- as suggested by the Examiner.

(42) In claim 8, lines 2-3, the recitation of "said center louver support member" should be changed to --said center louver support rail ~~member~~-- as suggested by the Examiner.

(43) In claim 8, line 4, the recitation of "said center louver support member" has been changed to --said center louver support rail ~~member~~-- as suggested by the Examiner.

(44) In claim 8, line 5, the recitation of "said center louver support" has been changed to --said center louver support rail-- as suggested by the Examiner.

(45) In claim 8, line 6, the recitation of "said pair of third secondary rails" has been changed to --said pair of third secondary [[rails]] rail members-- as suggested by the Examiner.

(46) In claim 8, lines 6-7, the recitation of "said fourth longitudinal rail" has been changed to --said fourth longitudinal rail member-- as suggested by the Examiner.

(47) In claim 8, line 8, the recitation of "said pair of third secondary rails" has been changed to --said pair of third secondary [[rails]] rail members-- as suggested by the Examiner.

(48) In claim 8, lines 8-9, the recitation of "said second longitudinal rail" has been changed to --said second longitudinal rail member-- as suggested by the Examiner.

(49) In claim 8, line 11, the recitation of "said center louver support" has been changed to --said center louver support rail-- as suggested by the Examiner.

(50) In claim 8, line 12, the recitation of "said pair of fourth secondary rails" has been changed to --said pair of fourth secondary [[rails]] rail members-- as suggested by the Examiner.

(51) In claim 8, lines 12-13, the recitation of "said fourth longitudinal rail" has been changed to --said fourth longitudinal rail member-- as suggested by the Examiner.

(52) In claim 8, line 14, the recitation of "said pair of fourth secondary rails" has been changed to --said pair of fourth secondary [[rails]] rail members-- as suggested by the Examiner.

(53) In claim 8, lines 14-15, the recitation of "said second longitudinal rail" has been changed to --said second longitudinal rail member-- as suggested by the Examiner.

(54) In claim 10, line 6, the recitation of "said longitudinal rails" has been changed to --said longitudinal [[rails]] rail members-- as suggested by the Examiner.

(55) In claim 11, line 5, the recitation of "said at least two longitudinal rails" has been changed to --said at least two longitudinal [[rails]] rail members-- as suggested by the Examiner.

(56) In claim 11, line 6, the recitation of "said at least two longitudinal rails" has been changed to --said at least two longitudinal [[rails]] rail members-- as suggested by the Examiner.

(57) In claim 11, line 5, the recitation of "said corner connection member" has been changed to --said at least one of said four corner connection members ~~member~~-- as suggested by the Examiner.

(58) In claim 11, lines 7-8, the recitation of "said at least two longitudinal rails" has been changed to --said at least two longitudinal [[rails]] rail members-- as suggested by the Examiner.

(57) In claim 11, line 8, the recitation of "said corner connection member" has been changed to --said at least one of said four corner connection members ~~member~~-- as suggested by the Examiner.

(58) In claim 12, lines 1-2, the recitation of "said first longitudinal rail" has been changed to --said first longitudinal rail member-- as suggested by the Examiner.

(59) In claim 12, lines 12-13, the recitation of "said first rail" has been changed to --said first longitudinal rail member-- as suggested by the Examiner.

(59) In claim 12, line 3, the recitation of "said rail" has been changed to --said first longitudinal rail member-- as suggested by the Examiner.

(60) In claim 12, lines 6-7, the recitation of "said first secondary rail" has been changed to --said first secondary rail member-- as suggested by the Examiner.

(61) In claim 12, line 8, the recitation of "said first secondary rail" has been changed to --said first secondary rail member-- as suggested by the Examiner.

(62) In claim 13, lines 1-2, the recitation of "all of said first, second, third, and fourth longitudinal rails" has been changed to --all of said four longitudinal rail members-- as suggested by the Examiner.

(62) In claim 14, lines 1-2, the recitation of "all of said first, second, third, and fourth longitudinal rails" has been changed to --all of said four longitudinal rail members-- as suggested by the Examiner.

(63) In claim 18, lines 1-2, the recitation of "at least said first frame corner connection member" has been changed to --at least one of said ~~first frame~~ four corner connection ~~member~~ members-- as suggested by the Examiner.

(64) In claim 18, lines 2-3, the recitation of "its second projection member" has been changed to --its second projection ~~member~~-- as suggested by the Examiner.

(65) In claim 19, lines 1-2, the recitation of "at least said first frame corner connection member" has been changed to --at least one of said ~~first frame~~ four corner connection ~~member~~ members-- as suggested by the Examiner.

(66) In claim 19, lines 2-3, the recitation of "its second projection member" has been changed to --its second projection ~~member~~-- as suggested by the Examiner.

(67) In claim 20, lines 2-3, the recitation of "its second projection member" has been changed to --its second projection ~~member~~-- as suggested by the Examiner.

(68) In claim 21, lines 2-3, the recitation of "its second projection member" has been changed to --its second projection ~~member~~-- as suggested by the Examiner.

(69) In claim 22, line 7, the recitation of "the plurality" has been changed to --the plurality of louver support receptacles-- as suggested by the Examiner.

(70) In claim 22, line 7, the recitation of "the first pair of rails" has been changed to --the first pair of perimeter rails-- as suggested by the Examiner.

(71) In claim 22, line 8, the recitation of "the plurality" has been changed to --the plurality of louver support receptacles-- as suggested by the Examiner.

(72) In claim 22, line 8, the recitation of "the first pair of rails" has been changed to --the first pair of perimeter rails-- as suggested by the Examiner.

(73) In claim 22, line 15, the recitation of "said one of said second pair of perimeter rails" has been changed to --said one of said ~~second~~ first pair of perimeter rails -- as suggested by the Examiner.

(74) In claim 22, lines 16-17, the recitation of "the other of said second pair of perimeter rails" should be changed to --the other of said ~~second~~ first pair of perimeter rails -- as suggested by the Examiner.

(75) In claim 23, line 13, the word --a-- has been inserted between the words "includes" and "latch" as suggested by the Examiner.

**Rejections under 35 U.S.C. § 112**

Claims 22, 32-35, 26-28 and 36 are patentable under 35 U.S.C. 112, first paragraph.

Claims 22, 32-35, 26-28 and 36 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. The claims, however, contains subject matter which was described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention. Applicants respectfully traverse this rejection for the reasons detailed below.

Claims 22 and 26, as amended, contain the limitations "wherein each of said plurality of louvers is supported by the center louver support rail but is not welded to the center louver support rail for increasing the strength of said plurality of louvers with respect to airborne objects".

This limitation is supported by the specification. Paragraphs 0078 - 0079 state that "each of the louvers 84 is a one-piece structure having its left distal end extending through a corresponding hole 40 in a left louver support rail 36A, its center region extending *through* aligned respective holes in the left center louver support rail 94A, the center wall 96 of I-frame 92, and the right center louver support rail 94B, and its right distal end extending through a corresponding hole 40 in the right louver support rail 36B." See, for example, paragraph 0078 (emphasis added). Nowhere does the specification require or mention coupling the louvers 84 to the center louver support rail, only that the louvers 84 pass through the center louver support rail. The one-piece louvers of paragraph 0078 are then described as having increased strength "with respect to airborne objects". See, for example, paragraph 0079.

One of ordinary skill in the art at the time the application was filed would be able to interpret the specification and figures to convey that the louvers are supported by the center louver support rail, but are not welded to the center louver support rail. By passing the louvers through the center support, forces from impacts by airborne objects are distributed over a larger area, i.e., the entire length of the louvers across both halves of the frame. If welded, forces from impacts by airborne objects would only be distributed over half the frame, i.e. from the outer rail member to the weld. Additionally, not welding the louvers to the center support allows for more flexibility upon impact because the louvers are able to slide relative to the center support and absorb additional force. Thus, having one-piece louvers not welded to the center support, as described in the specification, provides additional flexibility and strength during impacts from airborne objects compared to prior art shutters.

Furthermore, the specification makes no mention of coupling the louvers to the center louver support rail. Referring now to the right and left louver support rails, the specification indicates that "welding or adhesive is optional". See, for example, paragraph 0053. Thus, the specification describes when the louvers may be coupled to various structures. When describing the relationship of the louvers to the center louver support rail, the specification is silent on coupling the louver to the louver support rail and merely indicates that the louvers pass through the center louver support rail. As such, without specific mention, the specification may be read as leaving the louver uncoupled from the center louver support rail.

As further evidence, the assembly process described in the specification, which would be applicable to embodiments with and without a center louver support rail, illustrates that the louvers are inserted into slots 40 of the louver support rail 36A and then aligned with the slots 40 of the louver support rail 36B. See, for example, paragraph 0063. No mention is made of a step for welding or adhering the louvers to either the louver support rails 36A, 36B or the center louver

support rail. As such, one of reasonable skill in the art at the time of the application would understand that the louvers passed through the center louver support rail and were not coupled to the center louver support rail.

Additionally, the specification describes that the louvers are "*supported* in the center by member 82". See, for example, paragraph 0079. The louvers are supported, not welded to the center louver support rail.

Thus, the specification supports the claimed limitation of "wherein each of said plurality of louvers is supported by the center louver support rail but is not welded to the center louver support rail for increasing the strength of said plurality of louvers with respect to airborne objects".

Therefore, claims 22, 32-35, 26-28 and 36 are patentable under 35 U.S.C. 112, first paragraph. Withdrawal of the rejection and allowance of the claims are respectfully requested.

Claims 1-8, 10-15, 16, 18-21, 36-31, 33, 34 and 36 are patentable under 35 U.S.C. 112, second paragraph.

Claims 1-8, 10-15, 16, 18-21, 36-31, 33, 34 and 36 are rejected under 35 U.S.C. 112, second paragraph. The claims, however, are not indefinite and particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Applicants respectfully traverse this rejection for the reasons detailed below.

Regarding claim 1, the claim has been amended to read "wherein at least one of said four corner connection members has a latch-pin passage extending through its first projection in its extending direction, said ~~at least~~ one of said longitudinal rail members, said first of said longitudinal rail members comprises ~~that is a hollow box includes~~ an elongated clearance passage from an exterior of said first of said longitudinal rail members to a channel, extending in the direction of said channel, and said adjacent ~~another~~ of said longitudinal rail members comprises ~~rails includes~~ a latch

pin clearance hole, and further comprising a latch pin extending through and supported by said latch-pin passage".

The language has been amended to more clearly indicate that the "at least one longitudinal rail" refers to the previously introduced "first of said longitudinal rail members". Additionally, the term "hollow box" has been removed and the said one of said longitudinal rail members is now described by the term elongated clearance passage. The claim has also been amended to more clearly indicate that the "said rail" refers to the previously introduced "second of said longitudinal rail members". The claim has also been amended to more clearly indicate that the "another of said longitudinal rails" refers to the previously introduced "second of said longitudinal rail members". The claim has also been amended to recite "the four corner connectors". Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 2, the claim has been amended to more clearly illustrate that the rail member has an inner channel that is distinct from the receptacle introduced in claim 1. The inner channel is generally found throughout the mid section of the rail member whereas the receptacles are found proximate to the ends of the rail member. Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 11, the recitations of "said at least two longitudinal rails" have been changed to --said at least two longitudinal [[rails]] rail members-- as suggested by the Examiner. Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 15, the four instances of the term "four frame" have been amended as suggested by the Examiner. The term "unitary frame" has been replaced by "a frame comprising the first, second, third and fourth outer frame members", which has proper antecedent basis. The word "mount" has been removed from the "latch pin receiver mount" as this is the same term used

previously in the claim. Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 26, "a" has been amended to "the" to correct antecedent basis. Antecedent basis has also been corrected for the "said another of said longitudinal rails" by amending to read "said second of said longitudinal rails. The term "unitary frame" has been replaced with "shutter", which has proper antecedent basis. Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 27, this claim has been canceled without prejudice.

Regarding claim 28, the word "mount" has been removed from the "latch pin receiver mount" as this is the same term used previously in the claim. Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 29, the word "mount" has been removed from the "latch pin receiver mount" as this is the same term used previously in the claim. Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 33, the term "said corner connectors" has been replaced with "said four corner connection members" to correct antecedent basis. Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 34, the word "mount" has been removed from the "latch pin receiver mount" as this is the same term used previously in the claim. Applicant respectfully submits that no new matter has been added by the amendments.

Regarding claim 36, the word "mount" has been removed from the "latch pin receiver mount" as this is the same term used previously in the claim. Applicant respectfully submits that no new matter has been added by the amendments.

Therefore, claims 1-8, 10-15, 16, 18-21, 36-31, 33, 34 and 36 are patentable under 35 U.S.C. 112, second paragraph. Withdrawal of the rejection and allowance of the claims are respectfully requested.

**Rejections under 35 U.S.C. § 102**

Claim 22 is patentable under 35 U.S.C. 102(b) over Foster et al. (US Patent 6,536,174).

Independent claim 22 is patentable over Foster. Reconsideration and withdrawal of the rejection are requested.

Independent claim 22 is amended to add that "each of said plurality of louvers is supported by the center louver support rail but is not welded to the center louver support rail for increasing the strength of said plurality of louvers with respect to airborne objects".

Foster does not discloses louvers passing through a center support without welding the louvers to the center support. Independent claim 22 requires that the louvers are "not welded" to the center louver support rail. By not welding, Applicants' invention improves resistance of the overall structure to high energy impacts by evenly distributing load across the louver on both sides of the center louver support rail. By not coupling the louvers to the center louver support rail, load from impacts on a louver on one side of the center louver support rail are at least partially transferred to the louver on the opposite side of the center louver support rail. The louvers of Foster do not distribute load because they are welded to the center support. Because of the weld, force is only distributed from the louver to the center support and not to the center support and both side supports. The lack of load distribution in Foster concentrates force at the attachment points of the louver to the center support. The larger load due to the smaller effective louver length reduces overall strength of the window coverings.

Foster does not teach "each of said plurality of louvers is supported by the center louver support rail but is not welded to the center louver support rail for increasing the strength of said plurality of louvers with respect to airborne objects" as required by the claim. In contrast, Foster discloses welding and sealing flatbars 22 to a central support member 20 on inner surfaces of the

central support member 20. Foster at C. 3, ll. 19 - 23. This practice is exactly opposite of the Applicants' claim to not welding the louvers to the center louver support rail for improving strength during hurricanes and other applied forces.

Contrary to the arguments on page 18 of the Office Action, the attachment points in Foster at the center support do not assist in increasing strength of the louvers with respect to airborne objects as required by the claims. The welding of Foster is used to weather seal and improve aesthetics. Foster at C. 3, ll. 19 - 23. In fact, as described above, the welding of the flatbars of Foster to the center support actually decreases overall strength of the device.

As such, Foster does not teach every element of the claimed invention. Therefore, claim 22 is patentable over Foster. Reconsideration and withdrawal of the rejection are requested.

## Rejections under 35 U.S.C. § 103

Claims 1-3, 11, 15, 18-21 and 29 are patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of any one of White (US Patent 5,450,701), Guillemet (US Patent 5,431,211), and Silverman (US Patent 6,845,593).

Claims 1 - 3, 11, 15, 18 - 21 and 29 are patentable over Escudero Ribas in view of White, Guillemet and Silverman. Reconsideration and withdrawal of the rejection are requested.

It would not have been obvious to one of ordinary skill in the art at the time of the invention to combine Escudero Ribas with any one of White, Guillemet, or Silverman to create Applicants' invention. At the time of Applicants' invention, it would not have been obvious to utilize an internal sliding latch-pin system that not only passed through a corner connection member, but also through a latch-pin clearance hole to allow the latch-pin to function as a security feature and as an attachment point for wind load testing.

Escudero Ribas discloses a louver door with fixed louver or luffer-boards. C. 1, ll. 3 - 5. Louver doors are assembled by placing laths at right angles within hollow spaces in door stiles. C. 1, ll. 54 - 58. Laths 33, 34, 35 join door stiles 1 with top rails 21 and bottom rails 30. C. 2, ll. 49 - 54. Escudero Ribas does not disclosure the use of the invention for windows, screens or shutters.

In contrast, White, Guillemet and Silverman each disclose use of frame corners for windows. For example, White discloses a corner bracket for retaining a screen frame assembly in a window. C. 1, ll. 6 - 11. Guillemet discloses a corner assembly for an insect screen in a window assembly. C. 1, ll. 1 - 34. Silverman discloses a movable window frames having retaining latches. C. 1, ll. 6 - 8. Each of the corner assemblies disclosed function in a window and allow for movement of the window and/or window screen in a direction perpendicular to the movement of a latch.

Independent claim 1 was amended to add that "said four corner connection members flex for reducing bending and twisting forces applied to said unitary frame". Similar amendments were made to independent claim 15. None of Escudero Ribas, White, Guillemet or Silverman teaches flexible corner connection members. The corner connections of the present invention flex to

provide protection of a window or door from impact during inclement weather. None of the corner members of the cited references disclose the ability to flex and withstand significant impacts, while reducing bending and twisting forces applied to a frame.

Furthermore, Escudero Ribas teaches away from flexible corner connection members. For example, Escudero Ribas teaches an assembly, i.e., "laths (33, 34 and 35) located at right angles respectively within the hollow spaces (36, 37 and 38) ... and in the hollow spaces (39, 40 and 41) of the rails (21) and (30)"), that are "*stiffened* by means of a subsequent gluing." Escudero Ribas at C. 2, ll. 49 - 55 (emphasis added). Escudero Ribas thus teaches increasing rigidity, which is the opposite of the flexibility of the claimed invention. Among other reasons for using stiffening, Escudero Ribas is a door that is intended to be stiff and rigid and retain its shape. The door of Escudero Ribas is not a hurricane shutter intended to withstand extreme bending and twisting forces applied to the frame. Escudero Ribas teaches that the corner connection members should be stiff rather than flexible. As such, Escudero Ribas should not be combined with other references that may teach flexible corner connection members.

It would not have been obvious to one of ordinary skill in the art at the time of the invention to combine the references as suggested in the Office Action because the corner assemblies as taught in White, Guillemet and Silverman would not function effectively in a louver door as taught in Escudero Ribas. "[A] patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was, independently, known in the prior art. Although common sense directs one to look with care at a patent application that claims as innovation the combination of two known devices according to their established functions, it can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the elements in the way the claimed new invention does." *KSR Int'l v. Teleflex, Inc.*, 127 S.Ct. at 1741. As such, it would not have been obvious to include corner assemblies with locking mechanisms at corners of the louver door in Escudero Ribas.

The window screens of White, Guillemet and Silverman do not function in the same manner as the louver door of Escudero Ribas. A window screen may generally be slid up or down to open a set amount. A louver door may generally be opened laterally to allow passage of air or objects. Corner connections and latch pins would not function in the same manner on window

screens or louver doors and it would not have been obvious to one of ordinary skill in the art at the time of the invention to combine the cited references.

Locking mechanisms at corners of a louver door would be inefficient because a user would need to either bend over nearly to the floor to reach a locking mechanism at a bottom corner or would need to reach up above the user's head to reach a locking mechanism at a top corner. A user would likely need to use a ladder or other similar device to reach a top corner of a louver door with a locking mechanism. Additionally, there would be no need for a locking mechanism on a louver door because a louver door does not contain movable parts that would need to be locked as in a window assembly. Therefore, it would not have been obvious to one of ordinary skill at the time of the invention to combine the corner mechanisms of White, Guillemet and Silverman with a louver door as taught by Escudero Ribas.

Independent claim 15 has been amended to add that "the latch pin passes through a latch pin receiver mounted exterior to the unitary frame, wherein the latch pin receiver mount comprises a camel bracket with two side plates and a through hole in one of the two side plates for receiving an end of the latch pin". The "adapted to" language has been removed. This limitation is now a positively recited limitation of the claim. None of Escudero, White, Guillemet or Silverman teaches a latch pin adapted to pass through a latch pin receiver as required by the claim. The pins of the cited references are not adapted to pass through a latch pin receiver mounted exterior to the frame.

Independent claims 1 and 15 require a latch pin and corresponding support structures within at least one corner connection member and rail members. The cited references do not disclose a latch pin as required in the claims. Therefore, independent claims 1 and 15 are patentable over the cited references. Withdrawal of the rejection is requested.

Dependent claims 2 - 3, 11, 18 - 19 and 29 depend from independent claim 1 and add further patentable features to the patentable features of independent claim 1. Dependent claims 20 - 21 depend from independent claim 15 and add further patentable features of independent claim 15.

Therefore, claims 1 - 3, 11, 15, 18 - 21 and 29 are patentable over Escudero Ribas in view of White, Guillemet and Silverman. Reconsideration and withdrawal of the rejection are requested.

Claims 4, 5, 12 - 14 and 16 are patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of any one of White (US Patent 5,450,701), Guillemet (US Patent 5,431,211), and Silverman (US Patent 6,845,593) and further in view of Matzke (US Patent 3,968,738).

Claims 4, 5, 12 - 14 and 16 are patentable over Escudero Ribas in view of White, Guillemet and Silverman and further in view of Matzke. Reconsideration and withdrawal of the rejection are requested.

Independent claims 1 and 15 are patentable over Escudero Ribas in view of White, Guillemet and Silverman as described above. Dependent claims 4, 5 and 12 - 14 depend from independent claim 1 and add further patentable features to the patentable features of independent claim 1. Dependent claim 16 depends from independent claim 15 and adds further patentable features to the patentable features of independent claim 15.

Therefore, claims 4, 5, 12 - 14 and 16 are patentable over Escudero Ribas in view of White, Guillemet and Silverman and further in view of Matzke. Reconsideration and withdrawal of the rejection are requested.

Claims 6 - 8 are patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of any one of White (US Patent 5,450,701), Guillemet (US Patent 5,431,211), Silverman (US Patent 6,845,593), further in view of Matzke (US Patent 3,968,738) and further in view of Foster et al. (US Patent 6,536,174).

Claims 6 - 8 are patentable over Escudero Ribas in view of White, Guillemet and Sullivan and further in view of Matzke and further in view of Foster. Reconsideration and withdrawal of the rejection are requested.

Independent claim 1 is patentable over Escudero Ribas as described above. Dependent claims 6 - 8 depend from independent claim 1 and add further patentable features to the patentable features of independent claim 1.

Therefore, claims 6 - 8 are patentable over Escudero Ribas in view of White, Guillemet and Sullivan and further in view of Matzke and further in view of Foster.

Claim 22 is patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of Matzke (US Patent 3,968,738) and Foster et al. (US Patent 6,536,174).

Independent claim 22 is patentable over Escudero Ribas in view of Matzke and further in view of Foster. Reconsideration and withdrawal of the rejection are requested.

Independent claim 22 has been amended to add that "each of said plurality of louvers is supported by the center louver support rail but is not welded to the center louver support rail for increasing the strength of said plurality of louvers with respect to airborne objects".

None of the cited references discloses louvers passing through a center support without welding to the center support. Applicants' invention improves resistance of the overall structure to high energy impacts by evenly distributing load across the louver. The louvers of the cited references do not do this and in fact concentrate force at the attachment points to the center louver, thus reducing overall strength of the window coverings.

Neither Escudero Ribas not Matzke teach a louver extending through a center support as indicated in the Office Action at pages 30 - 32. Foster has been cited as teaching a center support. However, Foster does not teach a louver passing through a center support but not welded to the center support as required by the claims.

Foster does not discloses louvers passing through a center support without welding the louvers to the center support. Independent claim 22 requires that the louvers are "not welded" to the center louver support rail. By not welding, Applicants' invention improves resistance of the overall structure to high energy impacts by evenly distributing load across the louver on both sides of the center louver support rail. By not coupling the louvers to the center louver support rail, load from impacts on a louver on one side of the center louver support rail are at least partially transferred to the louver on the opposite side of the center louver support rail. The louvers of Foster do not distribute load because they are welded to the center support. Because of the weld, force is only distributed from the louver to the center support and not to the center support and both side supports. The lack of load distribution in Foster concentrates force at the attachment

points of the louver to the center support. The larger load due to the smaller effective louver length reduces overall strength of the window coverings.

Foster does not teach "each of said plurality of louvers is supported by the center louver support rail but is not welded to the center louver support rail for increasing the strength of said plurality of louvers with respect to airborne objects" as required by the claim. In contrast, Foster discloses welding and sealing flatbars 22 to a central support member 20 on inner surfaces of the central support member 20. Foster at C. 3, ll. 19 - 23. This practice is exactly opposite of the Applicants' claim to not welding the louvers to the center louver support rail for improving strength during hurricanes and other applied forces.

Contrary to the arguments on page 41 of the Office Action, the attachment points in Foster at the center support do not assist in increasing strength of the louvers with respect to airborne objects as required by the claims. The welding of Foster is used to weather seal and improve aesthetics. Foster at C. 3, ll. 19 - 23. In fact, as described above, the welding of the flatbars of Foster to the center support actually decreases overall strength of the device.

The cited references, Escudero Ribas, Matzke, and Foster do not teach every element of the claimed invention. Therefore, claim 22 is patentable over Escudero Ribas in view of Matzke and further in view of Foster. Reconsideration and withdrawal of the rejection are requested.

Claims 32 - 35 are patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of Matzke (US Patent 3,968,738) and Foster et al. (US Patent 6,536,174 and further in view of any one of White (US Patent 5,450,701), Guillemet (US Patent 5,431,211), Silverman (US Patent 6,845,593) and Liou (US Patent 4,937,979).

Claims 32 - 35 are patentable over Escudero Ribas in view of Matzke and further in view of Foster and further in view of White, Guillemet and Sullivan. Reconsideration and withdrawal of the rejection are requested.

Independent claim 22 is patentable over Escudero Ribas in view of Matzke and further in view of Foster as described above. Dependent claims 32 - 35 depend from independent claim 22 and add further patentable features to the patentable features of independent claim 22.

Therefore, claims 32 - 35 are patentable over Escudero Ribas in view of Matzke and further in view of Foster and further in view of White, Guillemet and Sullivan.

Claim 10 is patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of any one of White (US Patent 5,450,701), Guillemet (US Patent 5,431,211), and Silverman (US Patent 6,845,593) and further in view of either Hill (US Patent 6,345,476) or Figueiredo et al. (US Patent 5,549,148).

Claim 10 patentable over Escudero Ribas in view of White, Guillemet and Sullivan and further in view of Hill or Figueiredo. Reconsideration and withdrawal of the rejection are requested.

Independent claim 1 is patentable over Escudero Ribas in view of White, Guillemet and Silverman as described above. Dependent claim 10 depends from independent claim 1 and adds further patentable features to the patentable features of independent claim 1.

Therefore, claim 10 is patentable over Escudero Ribas in view of White, Guillemet and Sullivan and further in view of Hill or Figueiredo.

Claims 23 - 25 and 36 are patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of any one of White (US Patent 5,450,701), Guillemet (US Patent 5,431,211), Silverman (US Patent 6,845,593) and Liou (US Patent 4,937,979).

Claims 23 - 25 and 36 are patentable over Escudero Ribas in view of White, Guillemet and Silverman and further in view of Liou. Reconsideration and withdrawal of the rejection are requested.

It would not have been obvious to one of ordinary skill in the art at the time of the invention to combine Escudero Ribas with any one of White, Guillemet, or Silverman and Liou to create Applicants' invention. At the time of Applicants' invention, it would not have been obvious to utilize an internal sliding latch-pin system that not only passed through a corner connection member, but also through a latch-pin clearance hole to allow the latch-pin to function as a security feature and as an attachment point for wind load testing.

Escudero Ribas discloses a louver door with fixed louver or luffer-boards. C. 1, ll. 3 - 5. Louver doors are assembled by placing laths at right angles within hollow spaces in door stiles. C. 1, ll. 54 - 58. Laths 33, 34, 35 join door stiles 1 with top rails 21 and bottom rails 30. C. 2, ll. 49 - 54. Escudero Ribas does not disclosure the use of the invention for windows, screens or shutters.

In contrast, White, Guillemet and Silverman each disclose use of frame corners for windows. For example, White discloses a corner bracket for retaining a screen frame assembly in a window. C. 1, ll. 6 - 11. Guillemet discloses a corner assembly for an insect screen in a window assembly. C. 1, ll. 1 - 34. Silverman discloses a movable window frames having retaining latches. C. 1, ll. 6 - 8. Each of the corner assemblies disclosed function in a window and allow for movement of the window and/or window screen.

Liou discloses an upper and lower sliding mechanism. See Liou Abstract. A plastic U-shaped member 20 has vertical side wall with longitudinally extending projections 21 corresponding to the recesses between the projections 121 on the upper groove 12. In contrast to Applicants' invention, which uses lands and grooves to secure a corner connection member in place within a perimeter rail, Liou discloses projections and grooves to ensure movement of the sliding mechanisms relative to one another.

Independent claim 23 was amended to add that "the L-shaped corner connection members flex for reducing bending and twisting forces applied to said rectangular frame". None of Escudero Ribas, White, Guillemet or Silverman teaches flexible corner connection members. The corner connections of the present invention flex to provide protection of a window or door from impact during inclement weather. None of the corner members of the cited references disclose the ability to flex and withstand significant impacts, while reducing bending and twisting forces applied to a frame.

Furthermore, Escudero Ribas teaches away from flexible corner connection members. For example, Escudero Ribas teaches an assembly, i.e., "laths (33, 34 and 35) located at right angles respectively within the hollow spaces (36, 37 and 38) ... and in the hollow spaces (39, 40 and 41) of the rails (21) and (30)"), that are "*stiffened* by means of a subsequent gluing." Escudero Ribas at C. 2, ll. 49 - 55 (emphasis added). Escudero Ribas thus teaches increasing rigidity, which is the opposite of the flexibility of the claimed invention. Among other reasons for using stiffening, Escudero

Ribas is a door that is intended to be stiff and rigid and retain its shape. The door of Escudero Ribas is not a hurricane shutter intended to withstand extreme bending and twisting forces applied to the frame. Escudero Ribas teaches that the corner connection members should be stiff rather than flexible. As such, Escudero Ribas should not be combined with other references that may teach flexible corner connection members.

It would not have been obvious to one of ordinary skill in the art at the time of the invention to combine the references as suggested in the Office Action because the corner assemblies as taught in White, Guillemet and Silverman would not function effectively in a louver door as taught in Escudero Ribas. It would not have been obvious to include corner assemblies with locking mechanisms at corners of the louver door in Escudero Ribas.

The window screens of White, Guillemet and Silverman do not function in the same manner as the louver door of Escudero Ribas. A window screen may generally be slid up or down to open a set amount. A louver door may generally be opened laterally to allow passage of air or objects. Corner connections and latch pins would not function in the same manner on window screens or louver doors and it would not have been obvious to one of ordinary skill in the art at the time of the invention to combine the cited references.

Locking mechanisms at corners of a louver door would be inefficient because a user would need to either bend over nearly to the floor to reach a locking mechanism at a bottom corner or would need to reach up above the user's head to reach a locking mechanism at a top corner. A user would likely need to use a ladder or other similar device to reach a top corner of a louver door with a locking mechanism. Additionally, there would be no need for a locking mechanism on a louver door because a louver door does not contain movable parts that would need to be locked as in a window assembly. Therefore, it would not have been obvious to one of ordinary skill at the time of the invention to combine the corner mechanisms of White, Guillemet and Silverman with a louver door as taught by Escudero Ribas.

Independent claim 23 requires a latch pin and corresponding support structures within at least one corner connection member and rail members. The cited references do not disclose a latch pin as required in the claims. Therefore, independent claim 23 is patentable over the cited references. Withdrawal of the rejection is requested.

Dependent claims 24, 25 and 36 depend from independent claim 23 and add further patentable features to the patentable features of independent claim 23. Therefore, claims 23 - 25 and 36 are patentable over Escudero Ribas in view of White, Guillemet and Silverman and further in view of Liou. Reconsideration and withdrawal of the rejection are requested.

Claims 30 and 31 are patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of any one of White (US Patent 5,450,701), Guillemet (US Patent 5,431,211), and Silverman (US Patent 6,845,593) and further in view of Liou (US Patent 4,937,979).

Claims 30 and 31 are patentable over Escudero Ribas in view of White, Guillemet and Silverman and further in view of Liou. Reconsideration and withdrawal of the rejection are requested.

Independent claims 1 and 15 are patentable over Escudero Ribas in view of White, Guillemet and Silverman as described above. Dependent claims 30 and 31 depend from independent claims 1 and 15, respectively, and add further patentable features to the patentable features of independent claims 1 and 15, respectively.

Therefore, claims 30 and 31 are patentable over Escudero Ribas in view of White, Guillemet and Silverman and further in view of Liou. Reconsideration and withdrawal of the rejection are requested.

Claims 26 and 28 are patentable under 35 U.S.C. 103(a) over Escudero Ribas (US Patent 3,638,383) in view of Matzke (US Patent 3,968,738), further in view of Foster et al. (US Patent 6,536,174), further in view of any one of White (US Patent 5,450,701), Guillemet (US Patent 5,431,211), and Silverman (US Patent 6,845,593), further in view of either Hill (US Patent 6,345,476) or Figueiredo et al. (US Patent 5,549,148) and further in view of Liou (US Patent 4,937,979).

Claims 26 and 28 are patentable over Escudero Ribas in view of Matzke and further in view of foster and further in view of White, Guillemet and Silverman and further in view of Hill and Figueiredo and further in view of Liou. Claim 27 has been canceled without prejudice. Reconsideration and withdrawal of the rejection are requested.

Applicants initially note that the Examiner has been forced to cobble together Applicants' invention using a minimum of six different references. Applicants do not believe it would have been obvious to one of ordinary skill in the art at the time of the application to search out and combine distinct elements from each of the cited references and combine them together to create Applicants' invention. The need for six different references alone weighs heavily in Applicants' favor on a determination of obviousness.

Claim 26 has been amended to recite: "wherein said center louver support rail is an I-frame comprising a center wall, four flanges, and ridges protruding from at least one interior surface of one of said four flanges and extending the length of said I-frame". Support for the amendment may be found at, for example, Specification paragraph 0069 and Figs. 13 - 14. "The I-frame 92 has a center wall 96 and four flanges 98. Ridges 98A, 98B, 98C, 98D, 98E, 98F, 98G and 98H extend the length of the I-frame 92." Specification paragraph 0069. Applicants respectfully submit that no new matter has been added by the amendments. The cited references do not disclose "wherein said center louver support rail is an I-frame comprising a center wall, four flanges, and ridges protruding from at least one interior surface of one of said four flanges and extending the length of said I-frame".

As such, it would not have been obvious to one of ordinary skill in the art at the time of the invention to combine Escudero Ribas with Matzke, Foster, any one of White, Guillemet, or Silverman, one of Hill and Figueiredo, and Liou to create Applicants' invention. At the time of Applicants' invention, it would not have been obvious to utilize an internal sliding latch-pin system that not only passed through a corner connection member, but also through a latch-pin clearance hole to allow the latch-pin to function as a security feature and as an attachment point for wind load testing.

Escudero Ribas discloses a louver door with fixed louver or luffer-boards. C. 1, ll. 3 - 5. Louver doors are assembled by placing laths at right angles within hollow spaces in door stiles. C. 1, ll. 54 - 58. Laths 33, 34, 35 join door stiles 1 with top rails 21 and bottom rails 30. C. 2, ll. 49 - 54. Escudero Ribas does not disclosure the use of the invention for windows, screens or shutters.

In contrast, White, Guillemet and Silverman each disclose use of frame corners for windows. For example, White discloses a corner bracket for retaining a screen frame assembly in a

window. C. 1, ll. 6 - 11. Guillemet discloses a corner assembly for an insect screen in a window assembly. C. 1, ll. 1 - 34. Silverman discloses a movable window frames having retaining latches. C. 1, ll. 6 - 8. Each of the corner assemblies disclosed function in a window and allow for movement of the window and/or window screen.

Matzke discloses plastic louver strips secured by two vertical frames with cut out portions. See Matzke Abstract. Matzke, however, does not disclose corner connection mechanisms or center louver supports as required by the claims.

Foster does not teach a louver passing through a center support but not coupled to the center support as required by the claims. In contrast, Foster discloses welding and sealing the flatbars 22 to the central support member 20 for preventing engagement with deteriorating weather conditions and improving aesthetics. C. 3, ll. 19 - 23. This practice is exactly opposite of the Applicants' claim to not coupling the louvers to the central support to allow access to inclement weather for improving strength during hurricanes and other applied forces.

Hill discloses a lock pin set 52. See Hill at C. 3, ll. 14 - 16. Figueiredo discloses a thumb screw 106. See Figueiredo at C. 3, ll. 53 - 55. Neither reference, however, discloses corner connection mechanisms nor center louver supports as required by the claims.

Liou discloses an upper and lower sliding mechanism. See Liou Abstract. A plastic U-shaped member 20 has vertical side wall with longitudinally extending projections 21 corresponding to the recesses between the projections 121 on the upper groove 12. In contrast to Applicants' invention, which uses lands and grooves to secure a corner connection member in place within a perimeter rail, Liou discloses projections and grooves to ensure movement of the sliding mechanisms relative to one another.

Independent claim 26 requires that "the four corner connection members flex for reducing bending and twisting forces applied to said shutter". None of Escudero Ribas, White, Guillemet, Silverman or Liou teaches flexible corner connection members. The corner connections of the present invention flex to provide protection of a window or door from impact during inclement weather. None of the corner members of the cited references disclose the ability to flex and withstand significant impacts, while reducing bending and twisting forces applied to a frame.

Furthermore, Escudero Ribas teaches away from flexible corner connection members. For example, Escudero Ribas teaches an assembly, i.e., "laths (33, 34 and 35) located at right angles respectively within the hollow spaces (36, 37 and 38) ... and in the hollow spaces (39, 40 and 41) of the rails (21) and (30)"), that are "stiffened by means of a subsequent gluing." See Escudero Ribas C. 2, ll. 49 - 55. Among other reasons, Escudero Ribas is a door that is intended to be stiff and rigid. The door of Escudero Ribas is not a hurricane shutter intended to withstand extreme bending and twisting forces applied to the frame. Instead, Escudero Ribas teaches that the corner connection members should be stiff rather than flexible. As such, Escudero Ribas cannot be combined with other references that may teach flexible corner connection members, which the cited references do not.

It would not have been obvious to one of ordinary skill in the art at the time of the invention to combine the references as suggested in the Office Action because the corner assemblies as taught in White, Guillemet and Silverman would not function effectively in a louver door as taught in Escudero Ribas. It would not have been obvious to include corner assemblies with locking mechanisms at corners of the louver door in Escudero Ribas.

The window screens of White, Guillemet and Silverman do not function in the same manner as the louver door of Escudero Ribas. A window screen may generally be slid up or down to open a set amount. A louver door may generally be opened laterally to allow passage of air or objects. Corner connections and latch pins would not function in the same manner on window screens or louver doors and it would not have been obvious to one of ordinary skill in the art at the time of the invention to combine the cited references.

Locking mechanisms at corners of a louver door would be inefficient because a user would need to either bend over nearly to the floor to reach a locking mechanism at a bottom corner or would need to reach up above the user's head to reach a locking mechanism at a top corner. A user would likely need to use a ladder or other similar device to reach a top corner of a louver door with a locking mechanism. Additionally, there would be no need for a locking mechanism on a louver door because a louver door does not contain movable parts that would need to be locked as in a window assembly. Therefore, it would not have been obvious to one of ordinary skill at the time of the invention to combine the corner mechanisms of White, Guillemet and Silverman with a louver door as taught by Escudero Ribas.

Foster does not discloses louvers passing through a center support without welding the louvers to the center support. Independent claim 26 requires that the louvers are "not welded" to the center louver support rail. By not welding, Applicants' invention improves resistance of the overall structure to high energy impacts by evenly distributing load across the louver on both sides of the center louver support rail. By not coupling the louvers to the center louver support rail, load from impacts on a louver on one side of the center louver support rail are at least partially transferred to the louver on the opposite side of the center louver support rail. The louvers of Foster do not distribute load because they are welded to the center support. Because of the weld, force is only distributed from the louver to the center support and not to the center support and both side supports. The lack of load distribution in Foster concentrates force at the attachment points of the louver to the center support. The larger load due to the smaller effective louver length reduces overall strength of the window coverings.

Foster does not teach "each of said plurality of louvers is supported by the center louver support rail but is not welded to the center louver support rail for increasing the strength of said plurality of louvers with respect to airborne objects" as required by the claim. In contrast, Foster discloses welding and sealing flatbars 22 to a central support member 20 on inner surfaces of the central support member 20. Foster at C. 3, ll. 19 - 23. This practice is exactly opposite of the Applicants' claim to not welding the louvers to the center louver support rail for improving strength during hurricanes and other applied forces.

Contrary to the arguments on page 59 of the Office Action, the attachment points in Foster at the center support do not assist in increasing strength of the louvers with respect to airborne objects as required by the claims. The welding of Foster is used to weather seal and improve aesthetics. Foster at C. 3, ll. 19 - 23. In fact, as described above, the welding of the flatbars of Foster to the center support actually decreases overall strength of the device.

Independent claim 26 requires a latch pin and corresponding support structures within at least one corner connection member and rail members. The cited references do not disclose a latch pin as required in the claims. Therefore, independent claim 26 is patentable over the cited references. Withdrawal of the rejection is requested.

Dependent claim 27 has been canceled. Dependent claim 28 depends from independent claim 26 and adds further patentable features to the patentable features of independent claim 26.

Therefore, claims 26 and 28 are patentable over Escudero Ribas in view of Matzke and further in view of Foster and further in view of White, Guillemet and Silverman and further in view of Hill and Figueiredo and further in view of Liou. Reconsideration and withdrawal of the rejection are requested.

## CONCLUSION

In view of the above remarks and amendments, Applicants respectfully submit that each of the pending objections and rejections has been addressed and overcome, placing the present application in condition for allowance. A notice to that effect is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to contact the undersigned.

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), Applicants hereby petition for a three (3) months extension of time for filing a reply to the Office Action and submit the required $555.00 extension fee herewith.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 50-2228, under Order No. 021200.0101PTUS from which the undersigned is authorized to draw.

Dated: July 1, 2009

Respectfully submitted,

By Michele V Frank by [signature] 55,360

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